

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MASSACHUSETTS MUTUAL LIFE INSURANCE
COMPANY,

Plaintiff,

v.

CREDIT SUISSE FIRST BOSTON MORTGAGE
SECURITIES CORP.; MORTGAGE ASSET
SECURITIZATION TRANSACTIONS, INC.; DLJ
MORTGAGE CAPITAL, INC.; UBS REAL ESTATE
SECURITIES INC.; CREDIT SUISSE SECURITIES (USA)
LLC; UBS SECURITIES LLC; LEE FARKAS; PAUL R.
ALLEN; RAY BOWMAN; DELTON DE'ARMAS;
DESIREE E. BROWN; ANDREW A. KIMURA; JEFFREY
A. ALTABEF; EVELYN ECHEVARRIA; MICHAEL A.
MARRIOTT; THOMAS ZINGALLI; DAVID MARTIN;
PER DYRVIK; HUGH CORCORAN; and PETER
SLAGOWITZ,

Defendants.

No. 3:11-cv-30048-MAP

**ASSENTED-TO MOTION FOR EXTENSION OF
DEFENDANTS JEFFREY A. ALTABEF'S AND PER DYRVIK'S TIME TO RESPOND
TO PLAINTIFF'S MOTION TO AMEND THE COMPLAINT WITH RESPECT TO,
AND FOR RECONSIDERATION OF THE DISMISSAL OF, DEFENDANTS JEFFREY
A. ALTABEF AND PER DYRVIK**

Defendants Jeffrey A. Altabef and Per Dyrvik ("Defendants"), hereby move for an extension of time to respond to the Motion for Leave to Amend the Complaint with Respect to, and for Reconsideration of the Dismissal of, Jeffrey A. Altabef and Per Dyrvik (Dkt. No. 72) (the "Motion"), filed by Plaintiff Massachusetts Mutual Life Insurance Company ("Plaintiff") in the above-captioned action (the "Action"), as stipulated to by the parties, through their undersigned counsel, as set forth below. Plaintiff, through its undersigned counsel, assents to the motion.

On February 25, 2011, Plaintiff commenced the above-captioned action by filing a complaint (“Complaint”) in the United States District Court for the District of Massachusetts.

By Memorandum and Order entered on February 14, 2012, the Court dismissed Jeffrey A. Altabef and Per Dyrvik from the Action.

On February 29, 2012, Plaintiff filed its Motion for Leave to Amend the Complaint with Respect to, and for Reconsideration of the Dismissal of, Jeffrey A. Altabef and Per Dyrvik.

Counsel for Plaintiff and counsel for Defendants have conferred and have stipulated and agreed, subject to the approval of the Court, as follows:

1. Defendants’ time to respond to the Motion shall be extended to March 21, 2012.
2. Plaintiff may file a reply brief within seven (7) days following Defendants’ response to the Motion.
3. By entering into this stipulation, Plaintiff and Defendants do not waive, and expressly preserve, any and all rights and defenses, including but not limited to the right to replead or amend the allegations in support of any claims or assert any defenses relating to jurisdiction, venue, arbitration, service of process and statute of limitations or any counter-claims that may be available in this Action.

WHEREFORE, the parties respectfully request that this Court:

1. Grant the instant motion to enter an Order per the terms stipulated to by the parties, as set forth herein.
2. Grant such further relief as may be just and proper.

LOCAL RULE 7.1 CERTIFICATION

I, Kathy B. Weinman, certify that counsel for Plaintiffs have assented to this motion after conference.

Dated: March 14, 2012

Respectfully submitted,

/s/ Kathy B. Weinman
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing on March 14, 2012.

/s/ Kathy B. Weinman
Kathy B. Weinman

DATED: March 14, 2012